

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**NATIONAL RIFLE ASSOCIATION OF
AMERICA,**

Plaintiff and Counter-Defendant,

and

WAYNE LAPIERRE,

Third-Party Defendant,

v.

ACKERMAN MCQUEEN, INC.,

Defendant and Counter-Plaintiff,

and

**MERCURY GROUP, INC., HENRY
MARTIN, WILLIAM WINKLER,
MELANIE MONTGOMERY, AND JESSE
GREENBERG,**

Defendants.

Case No. 3:19-cv-02074-G

**PLAINTIFF THE NATIONAL RIFLE ASSOCIATION AND THIRD-PARTY
DEFENDANT WAYNE LAPIERRE’S RULE 26 INITIAL DISCLOSURE STATEMENT**

Pursuant to Rule 26(a) of the Federal Rules of Civil Procedure, Plaintiff the National Rifle Association and Third-Party Defendant Wayne LaPierre (collectively, the “NRA” or “Plaintiff”) make their initial disclosures relating to their causes of action against Defendants/Counter-Plaintiffs Ackerman McQueen, Inc., Mercury Group, Inc., Henry Martin, William Winkler, Melanie Montgomery, and Jesse Greenberg (collectively, “Defendants” or “AMc”), as stated below.

The NRA makes these initial disclosures subject to, and without waiving, their right to protect from disclosure any and all documents and communications protected by the attorney-client privilege, attorney-work product doctrine, and any other applicable privilege or exemption from discovery.

In addition, the NRA makes these initial disclosures without waiving any argument they may have concerning the relevancy or admissibility of, or proper weight to be accorded to, any of the materials or information disclosed or referenced herein. The NRA reserves the right to amend or supplement this Initial Disclosure based upon further investigation, further development of applicable facts, or receipt and review of Defendants' responses or other information.

I.

DISCLOSURE PURSUANT TO RULE 26(a)(1)(A)(i)

The following individuals are likely to have discoverable information that Plaintiff may use to support Plaintiff's claims and defenses in this action, as follows:

No.	Name	Organization and Title	Contact Information	Subject Matter
1.	Corporate Representative, 5.11 Tactical	NRATV Sponsor	1360 Reynolds Ave, Suite 101 Irvine, CA 92614	NRATV viewership analytics, and AMc's budget for NRATV.
2.	Corporate Representative, Adcor Defense	NRATV Sponsor	7104 Biter Lane, Highland, MD 20777	NRATV viewership analytics, and AMc's budget for NRATV.
3.	Alexander Varney	Former AMc Producer	1409 Bankston Dr. Wylie, TX 75098	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
4.	Andrew Arulanandam	NRA Managing Director of	1717 Main Street Dallas, TX 75201	NRA's requests for AMc books and records, and AMc's

		Public Affairs	(214) 653-4000	unauthorized use of the NRA's intellectual property.
5.	Andrew Butler	Former AMc Employee	Address Unknown	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
6.	Anthony Makris	President of Mercury Group	Brian Mason 300 Crescent Ct. Ste. 400 Dallas, TX 75201 (214) 981-9929	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
7.	Bill Winkler	AMc CFO	Brian Mason 300 Crescent Ct. Ste. 400 Dallas, TX 75201 (214) 981-9929	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
8.	Brandon Winkler	AMc Chief Administrative Officer	Brian Mason 300 Crescent Ct. Ste. 400 Dallas, TX 75201 (214) 981-9929	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
9.	Brian Darley	AMc Vice President, Digital Media	Brian Mason 300 Crescent Ct. Ste. 400 Dallas, TX 75201 (214) 981-9929	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
10.	Corporate Representative, Cabela's Outdoor Fund	NRATV Sponsor	69160 1 Cabelas Dr. Sidney, NE 69162	NRATV viewership analytics, and AMc's budget for NRATV.
11.	Cam Edwards	NRATV host	18125 E James Anderson Hwy Dillwyn, VA 23936	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
12.	Carl Warner	Former AMc Exec. VP / Creative Director	5519 Anita St. Dallas, TX 75206	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
13.	Carly Jameson	Former AMc	Address Unknown	NRATV viewership analytics,

		Account Executive		the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
14.	Carolyn Meadows	NRA Director and President	1717 Main Street Dallas, TX 75201 (214) 653-4000	Extortion attempt against Wayne LaPierre.
15.	Charles Berthelot	Former AMc Senior Director	3225 Gidran Drive Fort Worth, TX 76244	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
16.	Charles Cotton	NRA Director	1717 Main Street Dallas, TX 75201 (214) 653-4000	NRA's concerns regarding AMc spending of NRA funds.
17.	Chester Campbell	Former AMc Vice President / Digital Development	2313 Owens Blvd. Richardson, Texas 75082	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
18.	Clay Turner	Former AMc Executive Vice President / Creative Director	505 Red Cliff R. Colorado Springs, CO 80906	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
19.	Collins Idehen	Former NRATV host	Address Unknown	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
20.	Corporate Representative, Colt Manufacturing Company LLC	NRATV Sponsor	545 New Park Ave., West Hartford, CT 06110	NRATV viewership analytics, and AMc's budget for NRATV.
21.	Corporate Representative, Compass RE Texas	Former AMc Client	211 7th Street, Suite 620, Austin TX 78701	AMc's business practices, billing, and reputation in the industry.
22.	Corporate Representative, American Clean	Former AMc Client	1875 Connecticut Avenue, Suite 705 Washington DC, 20009	AMc's reputation including but not limited to its billing practices, its business practices,

	Skies Foundation			and its client retention.
23.	Corporate Representative, Chesapeake Energy Corporation	Former AMc Client	6100 North Western Ave. Oklahoma City, OK 73118	AMc's reputation including but not limited to its billing practices, its business practices, and its client retention.
24.	Corporate Representative, Crossman Corporation	NRATV Sponsor	7629 Routes 5 & 20 Bloomfield, NY 14469	NRATV viewership analytics, and AMc's budget for NRATV.
25.	Corporate Representative, Greater Oklahoma City Chamber of Commerce	Former AMc Client	123 Park Avenue Oklahoma City, OK 73102	AMc's reputation including but not limited to its billing practices, its business practices, and its client retention.
26.	Corporate Representative, Hornady Manufacturing Company	NRATV Sponsor	3625 West Old Potash Hwy Grand Island, NE 68803	NRATV viewership analytics, and AMc's budget for NRATV.
27.	Corporate Representative, Integris Health, Inc.	Former AMc Client	3300 NW Expressway Oklahoma City, OK 73122	AMc's reputation including but not limited to its billing practices, its business practices, and its client retention.
28.	Corporate Representative, Kimber Mfg. Inc.	NRATV Sponsor	1120 Saw Mill River Rd. Yonkers, NY 10710	NRATV viewership analytics, and AMc's budget for NRATV.
29.	Corporate Representative, LeapFrog Enterprises	Former AMc Client	6401 Hollis Street, Ste. 100 Emeryville, CA 94608	AMc's reputation including but not limited to its billing practices, its business practices, and its client retention.
30.	Corporate Representative, Mossberg Corporation	NRATV Sponsor	7 Grasso Avenue North Haven, CT 06473	NRATV viewership analytics, and AMc's budget for NRATV.
31.	Corporate Representative, Oklahoma Department of	Former AMc Client	900 N Stiles Ave #3234 Oklahoma City, OK 73104	AMc's reputation including but not limited to its billing practices, its business practices, and its client retention.

	Tourism and Recreation			
32.	Corporate Representative, Oklahoma Gas & Electric	Former AMc Client	321 North Harvey P.O Box 321 Oklahoma City, OK 73101	AMc's reputation including but not limited to its billing practices, its business practices, and its client retention.
33.	Corporate Representative, Oklahoma State University Foundation	Former AMc Client	400 S. Monroe Street Stillwater, OK 74074	AMc's reputation including but not limited to its billing practices, its business practices, and its client retention.
34.	Corporate Representative, Remington Firearms	NRATV Sponsor	870 Remington Drive P.O. box 700 Madison, NC 27025	NRATV viewership analytics, and AMc's budget for NRATV.
35.	Corporate Representative, Senior Star	Former AMc Client	1516 S. Boston, Ste. 301 Tulsa, OK 74119	AMc's reputation including but not limited to its billing practices, its business practices, and its client retention.
36.	Corporate Representative, Six Flags of America	Former AMc Client	13710 Central Ave Bowie, MD 20721	AMc's reputation including but not limited to its billing practices, its business practices, and its client retention.
37.	Corporate Representative, Vista Outdoor Inc.	NRATV Sponsor	1 Vista Way Anoka, MN 55303	NRATV viewership analytics, and AMc's budget for NRATV.
38.	Corporate Representative, Williams Companies Inc.	Former AMc Client	1 One Williams Center Tulsa, OK 74103	AMc's reputation including but not limited to its billing practices, its business practices, and its client retention.
39.	Corporate Representative, Workamajig, Inc.	AMc time-tracking application	721 Auth Ave. Oakhurst, NJ 07755	AMc's time-keeping practices and information for services rendered, and identities of employees working on projects.
40.	Corporate Representative, WPX Energy Inc.	Former AMc Client	3500 One Williams Center Tulsa, OK 74172	AMc's reputation including but not limited to its billing practices, its business practices, and its client retention.
41.	Craig Spray	NRA CFO and	1717 Main Street	NRA's requests for AMc books

		Treasurer	Dallas, TX 75201 (214) 653-4000	and records; NRA's concerns regarding spending of NRA funds.
42.	Corporate Representative, CXIII Rex	Cigar Bar founded by AMc executives	113 King St, Alexandria, VA 22314	AMc's business practices, billing, and reputation in the industry.
43.	Dan Boren	Former NRA Director	3600 NW 174th St., Edmond, OK 73012 (580) 320-0435	AMc's accounting for time and services of personnel.
44.	Dana Loesch	NRATV host	150 Lilac Ln, Southlake, TX 76092-7408	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
45.	David Valinski	Former Special Assistant to Lt Col. Oliver North	200 Bella Harbor Ct., Unit 107 Palm Coast, FL 32137	NRATV viewership analytics, and AMc's budget for NRATV.
46.	Denise Sinisi	Former AMc Executive Producer	309 Timberline Drive N. Colleyville, TX 76034	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
47.	Dennis Azato	Former AMc VP / Director of Photography / Producer	10905 Ravenwood Dr. Manassas, VA 20111	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
48.	Duane Reno	NRA Travel Specialist and Office Coordinator, Office of the Treasurer	1717 Main Street Dallas, TX 75201 (214) 653-4000	NRA's requests for AMc books and records; NRA's concerns regarding spending of NRA funds
49.	Edmund Martin	Former Chairman of AMc Board	1916 Worthington LN, Edmond, OK 73013	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV; AMc's business practices, billing; the NRA's conspiracy

				claims; AMc's breaches of confidentiality.
50.	Edward Camron Selfridge	Former AMc host of Cam & Co.	18125 E James Anderson Hwy Dillwyn, VA 23936	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
51.	Emily Cummins	Former NRA Risk Manager	12104 Garden Grove Circle, Unit 403 Fairfax, VA	NRA's concerns regarding AMc spending of NRA funds.
52.	Eric Van Horn	Former AMc Account Executive	Address Unknown	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
53.	Gayle Stanford	I&IS Travel Principal	6100 Kentland Ave, Woodland Hills, CA 91367	NRA's payment of AMc's pass-through expenses.
54.	George Szucs	Former AMc Executive Producer	1460 Meandro Ria Ln. McKinney, TX 75069	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
55.	Gina Betts	Registered agent of WBB Investments, LLC	3413 Cornell Ave, Dallas, TX 75205	AMc's business practices, billing, and reputation in the industry.
56.	Ginny Simone	NRATV host	8614 Cavano St Naples, FL 34119	NRATV viewership analytics, and AMc's budget for NRATV.
57.	Corporate Representative, GPI-M Uptown, LP	AMc's landlord for Dallas office	1999 Bryan Street, Suite 900, Dallas TX 75201-3136	AMc's business practices, billing, and reputation in the industry.
58.	Grant Spofford	AMc Executive Vice President, Interactive Producer	2712 Pinehurst Drive Grapevine, TX 76051	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
59.	Grant	NRATV host	6217 Goliad Avenue	NRATV viewership analytics,

	Stinchfield		Dallas, TX 75214	the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
60.	Guy Mitchell	Former AMc Executive Producer	4128 Starlight Creek Ln. Celina, TX 75009	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
61.	Corporate Representative, HBC Auditors & Advisors	AMc's outside Auditor	9905 North May Ave., Oklahoma City, OK, 73120	AMc's business practices, billing, and reputation in the industry.
62.	Henry Martin	AMc Chief Creative Officer	Brian Mason 300 Crescent Ct. Ste. 400 Dallas, TX 75201 (214) 981-9929	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
63.	Corporate Representative, Hornady Manufacturing	NRATV Sponsor	State Spur 430, P.O. Box 1848, Grand Island, NE 68802	NRATV viewership analytics, and AMc's budget for NRATV.
64.	Jace Whatcott	Former AMc Media Strategist	3427 Cedar Springs, Apt. 1405 Dallas, TX 75219	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
65.	Jesse Greenberg	AMc Chief Strategy Officer	3902 Fairfax Avenue, Dallas, TX 75209	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
66.	John Frazer	NRA General Counsel	1717 Main Street Dallas, TX 75201 (214) 653-4000	NRA's requests for AMc books and records, concerns regarding spending of NRA funds and AMc's unauthorized use of NRA intellectual property.
67.	John Popp	Former AMc Executive Producer at Mercury Group	7414 Spring Summit Rd. Springfield, VA 22150	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and

				AMc's budget for NRATV.
68.	Jon Carter	Former AMc Senior Associate / Political Strategy	Address Unknown	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
69.	Josh Himes	AMc, Time-lapse Cinematographer	Brian Mason 300 Crescent Ct. Ste. 400 Dallas, TX 75201 (214) 981-9929	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
70.	Joshua Powell	Former NRA Chief of Staff	11552 Marquette Drive New Buffalo, MI 49117	NRA's requests for AMc books and records.
71.	Katie McQueen	AMC, Executive Vice President Management Supervisor	Brian Mason 300 Crescent Ct. Ste. 400 Dallas, TX 75201 (214) 981-9929	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
72.	Kristy Titus	NRATV host	1450 NW Gardner Road Prineville, OR 97754	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
73.	Lacey Duffy Cremer	AMc, Executive Vice President of Account Management	Brian Mason 300 Crescent Ct. Ste. 400 Dallas, TX 75201 (214) 981-9929	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
74.	Lance Olson	Former NRA Board Member	785 William Avenue Marengo, IA 52301	AMc's business practices, billing, and reputation in the industry, and the NRA's conspiracy claims.
75.	Corporate Representative, Landini Brothers Restaurant	Restaurant frequently billed to NRA	115 King St, Alexandria, VA 22314	AMc's business practices, billing, and reputation in the industry.
76.	Lisa Supernaugh	NRA Managing Director, Executive	1717 Main Street Dallas, TX 75201 (214) 653-4000	NRA's concerning AMc's spending of NRA funds.

		Operations		
77.	Mark Chestnut	Former AMc Sr. VP / Editorial Services	714 W 115th St. SW Jenks, OK 74037	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
78.	Melanie Montgomery	AMc Executive Vice President / Management Supervisor	Brian Mason 300 Crescent Ct. Ste. 400 Dallas, TX 75201 (214) 981-9929	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
79.	Michael Aitken	Former AMc VP/Video Production	6030 River Forest Drive Manassas, VA 20112	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
80.	Michael Erstling	NRA Director of Budget and Financial Analysis	1717 Main Street Dallas, TX 75201 (214) 653-4000	NRA's concerns regarding spending of NRA funds and AMc's unauthorized use of NRA intellectual property.
81.	Michael Ives	Former AMc SVP / Corporate Director of Photography	4503 Charleswood Ave. Memphis, TN 38117	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
82.	Millie Hallow	NRA Executive Assistant	1717 Main Street Dallas, TX 75201 (214) 653-4000	NRA's requests for AMc books and records and Oliver North's attempt to extort Wayne LaPierre.
83.	Corporate Representative, Mojack Distributors	NRATV Sponsor	301 N Main Street 1600, Epic Center, Wichita, KS 67202	NRATV viewership analytics, and AMc's budget for NRATV.
84.	Nader Tavangar	AMc Executive	Brian Mason 300 Crescent Ct. Ste. 400 Dallas, TX 75201 (214) 981-9929	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
85.	Nancy Martin	Former AMc Executive Producer	Address Unknown	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and

				AMc's budget for NRATV.
86.	Natalie Foster	NRATV host	723 Sweet Gum Acres Road, El Dorado, AR 71730	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
87.	Nick Perrine	NRA, Special Assistant to the President	1717 Main Street Dallas, TX 75201 (214) 653-4000	NRA's requests for AMc books and records; NRA's concerns regarding spending of NRA funds.
88.	Noe Landini	Owner of Landini Brothers Restaurants and CXIII REX	726 Timber Branch Dr, Alexandria, VA 22302	NRA's payment of AMc's pass-through expenses.
89.	Corporate Representative, Nosler Inc.	NRATV Sponsor	107 SW Columbia Bend, OR 97702	NRATV viewership analytics, and AMc's budget for NRATV.
90.	Oliver North	NRA Director and Former President	1717 Main Street Dallas, TX 75201 (214) 653-4000	Extortion attempt against Wayne LaPierre.
91.	Corporate Representative, Omni Air Transport	Former AMc Client	1833 S Morgan Road Oklahoma City, OK 73128	AMc's business practices, billing, and reputation in the industry.
92.	Corporate Representative, Performance Improvement Partners	Former AMc Client	30 Trinity Street Hartford, CT 01606-0470	AMc's business practices, billing, and reputation in the industry.
93.	Portia Padilla	NRA Accounts Payable Manager	1717 Main Street Dallas, TX 75201 (214) 653-4000	NRA's concerns regarding spending of NRA funds.
94.	Rachel Bonilla	Former AMc Producer	Address Unknown	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
95.	Revan McQueen	AMc CEO	Brian Mason 300 Crescent Ct. Ste. 400 Dallas, TX 75201 (214) 981-9929	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and

				AMc's budget for NRATV.
96.	Rick Tedrick	NRA Employee	1717 Main Street Dallas, TX 75201 (214) 653-4000	NRA's concerns regarding AMc spending of NRA funds.
97.	Rodney Autaubo	AMc Senior Producer	Brian Mason 300 Crescent Ct. Ste. 400 Dallas, TX 75201 (214) 981-9929	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
98.	Rodney Lipe	AMc Director of Client services	Brian Mason 300 Crescent Ct. Ste. 400 Dallas, TX 75201 (214) 981-9929	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
99.	Corporate Representative, RSUI Indemnity, Inc.	Former AMc Client	900 Elm Street, Manchester, NH 03101	AMc's business practices, billing, and reputation in the industry.
100.	Corporate Representative, Smith & Wesson	NRATV Sponsor	2100 Roosevelt Ave Springfield, MA 01104	NRATV viewership analytics, and AMc's budget for NRATV.
101.	Sonya Rowling	NRA Director of Accounting and Operations and Financial Reporting	1717 Main Street Dallas, TX 75201 (214) 653-4000	NRA's concerns regarding AMc spending of NRA funds.
102.	Stephanie West	Former AMc Assistant to the President	Address unknown	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
103.	Stephen Walters	Former AMc Director of Photography / Colorist	Address unknown	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
104.	Steve Hart	Former NRA Counsel	1200 New Hampshire Ave. NW, Suite 800 Washington, DC 20036 (202) 517-0585	NRA's requests for AMc books and records.

105.	Tammy Payne	AMc Senior Vice President / Creative Director	1513 Two Bridge Drive, Oklahoma City, OK 73131	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
106.	Corporate Representative, The Rendon Group	Oliver North consultant	1875 Connecticut Ave, Washington, DC 20009	NRA's conspiracy claims.
107.	Tim Herr	Former AMc Copywriter / Editor	Address Unknown	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
108.	Travis Lee Almand	AMc Senior Interactive Developer	815 Fairlawn St. Allen, TX 75002	NRATV viewership analytics, the presentations regarding NRATV analytics that were presented to the NRA, and AMc's budget for NRATV.
109.	Tyler Schropp	NRA Executive Director for the Office of Advancement, and former AMc employee	1717 Main Street Dallas, TX 75201 (214) 653-4000	NRA's concerns regarding AMc spending of NRA funds.
110.	Corporate Representative, Velocity Outdoor	NRATV Sponsor	7629 State 5 and 20 Bloomfield, NY 14469	NRATV viewership analytics, and AMc's budget for NRATV.
111.	Wayne LaPierre	NRA Executive Vice President and CEO	1717 Main Street Dallas, TX 75201 (214) 653-4000	NRA's requests for AMc books and records, and North's extortion attempt against him.
112.	Wilson Phillips	Former NRA CFO and Treasurer	4602 Gilbert Avenue Dallas, TX 75219 (703) 626-6757	NRA's payment of AMc's pass-through expenses.

In addition, Plaintiff anticipates that other, unknown individuals may have discoverable information that Plaintiff may use to support its claims or defenses. Plaintiff incorporates by

reference any other individuals disclosed by other parties in this matter and reserves the right to supplement this disclosure pursuant to Federal Rule of Civil Procedure 26(e).

Plaintiff also reserves the right to obtain discovery in support of its claims or defenses from any witness identified in any other party's Rule 26(a)(1) disclosure.

II.

DISCLOSURE PURSUANT TO RULE 26(a)(1)(A)(ii)

Plaintiff submits the following description of documents, electronically stored information or tangible things in its personal possession, custody or control that Plaintiff may use to support its claims or defenses, by category:

- a. Documents relating to services provided under the parties' Services Agreement;
- b. Communications between Plaintiff and Defendants regarding services provided under the Services Agreement;
- c. Communications and documents regarding NRATV;
- d. Communications and documents regarding AMc's pass-through expenses to the NRA;
- e. Documents regarding AMc employee time spent on NRA projects.

III.

DISCLOSURE PURSUANT TO RULE 26(a)(1)(A)(iii)

The NRA is seeking compensatory damages for injuries sustained as a result of Defendants' wrongful conduct, in at least the amount of \$40 million; punitive or exemplary damages in an amount to be determined at trial; forfeiture and disgorgement in at least the amount of \$100 million; attorneys' fees, costs, and expenses, in an amount to be determined by the Court; pre-judgment and post-judgment interest at the highest lawful rate; and such other relief at law or in equity, to which it may be justly entitled.

Plaintiff will provide Defendants with an expert damages report as to all the claims in Plaintiff's Amended Complaint, in accordance with the scheduling order entered in this case.¹

IV.

DISCLOSURE PURSUANT TO RULE 26(a)(1)(A)(iv)

The NRA will make available for inspection by Defendants any and all insurance agreements that may indemnify or reimburse Plaintiff for any payments made to satisfy any judgment in this action, on conditions that any such agreements shall be treated as "Confidential" under the Protective Order entered in this case.

Dated: October 15, 2020

Respectfully submitted,

**BREWER, ATTORNEYS &
COUNSELORS**

By: /s/ Alessandra P. Allegretto
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**ATTORNEYS FOR PLAINTIFF THE
NATIONAL RIFLE ASSOCIATION OF
AMERICA AND THIRD-PARTY
DEFENDANT WAYNE LAPIERRE**

¹ ECF No. 174.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served upon counsel of record in accordance with the Federal Rules of Civil Procedure.

/s/ Alessandra P. Allegretto

Alessandra P. Allegretto

4828-1367-2140.2
2277-08